

REMARKS

Applicant respectfully requests reconsideration of this application in view of the foregoing amendments and the following remarks.

Applicants concurrently file herewith an Information Disclosure Statement and accompanying PTO-1449 citing a reference to be considered and made of record in the examination of this application.

CLAIM STATUS

Claims 1-19 are pending and rejected. Claims 1, 7, 13 and 19 are independent in form. Claims 1-19 are herein amended. No new matter has been added by these amendments.

Independent Claims 1, 7, 13 and 19

Claims 1-19 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. 2002/0067412 to Kawai et al. (“Kawai”).

In rejecting independent claim 1 (see ¶2 of the Office Action), the Examiner has taken the position that Kawai discloses the invention as claimed. Applicants do not agree with the Examiner’s assertion that the present invention is so anticipated by Kawai.

Both Kawai and the present invention may be described as being directed to a camera control system for controlling a plurality of cameras, where a map showing the positions of the various cameras is included. Sensed images are fed back to be viewed by a user. Under both systems, the user may use a pointing device to operate an icon for a particular camera on the map for the purpose of controlling that camera’s operation remotely.

However, Applicants respectfully submit that there are fundamental differences between the two systems that distinguish the claimed invention from Kawai. At least one such

difference between the present application and Kawai is the way of designating which area on the map is to be sensed.

In Kawai, an angle of view and a direction of a image sensing apparatus is designated by a grab-and-drop operation of the lines, displayed on the map, representing the angle of view and the direction of the image sensing apparatus. Whereas under the present invention, the area where the user wants to watch is directly designated on the map without touching an icon of the image sensing apparatus.

By the direct designation of the image sensing area to be sensed, a user can designate a desired image sensing area more instinctively without being aware of “direction” and “angle of view” of the image sensing apparatus.

Under the present invention, the present state of a camera is captured and displayed (e.g., pan, zoom or tilt states of the selected camera acquired via the state display devices) and a “viewing target” (i.e., the image sensing area to be sensed) is designated. Such designation is effected by the designation device via the user operating a mouse to define a “mouse locus” area (e.g., as discussed with respect to figure 6). The defined mouse locus area is projected to a rectangular area which is then mapped relative to the actual state position of the camera being controlled. The control value calculation device then calculates the necessary control parameters to control the camera from its present states to the states necessary to view the designated target area based on the aforementioned designation.

The present invention describes a type of closed loop control system that closes its control loop around the mouse locus designation (i.e., the desired viewing target) and adjusts the camera parameters to achieve viewing of the designated viewing target.

Kawai, on the other hand, can be described as an open loop control configuration with respect to a resultant viewed image. Kawai simply allows a user to move a particular camera on a map display based upon provided control lines (e.g., 152-155) to change e.g., pan, tilt or zoom of a camera as discussed with respect to figure 14 of Kawai. The user drags those control lines with the mouse to achieve the desired view, as seen in image window 44 (Fig. 14).

Applicants respectfully submit that the Examiner has equated the moving of the camera indicator lines (152-155) of Kawai to the claimed designation device which is not an accurate analysis. There is no “designation” of an actual image sensing area in Kawai as defined by the present invention. Kawai allows a user to indirectly achieve viewing of an image sensing area by directly controlling, in isolation (via the grab-and-drop operation described above), camera states in order to obtain a desired viewing area as determined by the user’s viewing the fed back image shown in the image window 44 (e.g. Fig 14). The user continues to change camera parameters (i.e., pan, tilt or zoom) until the desired image is viewed. The desired viewing target in Kawai plays no part in control calculation feedback and is not taken into account by its automatic camera control- only through the user is the desired viewing area (by feedback image) considered.

The Examiner has rejected the remaining independent claims (7, 13, and 19) for similar reasons as claim 1 because they are “substantively equivalent” to Claim 1 (see ¶8, ¶14 and ¶20, respectively, of the Office Action). Accordingly, the foregoing discussion with respect to claim 1 similarly applies to distinguish these other independent claims.

The system of the present invention is thus different from Kawai in at least these respects. While a correct interpretation of the claimed designation means (as recited in the rejected pending claims) would include aspects of the foregoing functionality, independent

claims 1, 7, 13 and 19 have been amended to further clarify the claimed invention and in part to explicitly recite, *inter alia*, these features which were at least implicit in the rejected claims.

Thus Applicants respectfully submit that the claimed invention as recited in the amended independent claims is neither anticipated nor rendered obvious in view of Kawai, taken individually or in combination with any other art of record and respectfully request that the rejections in view of Kawai be withdrawn.

Distinction From Prior Art Disclosed In The Concurrently Filed IDS:

The amendment to claims 1, 17, 13 and 19 to more clearly describe the designation function depicted, e.g., in Fig. 6 of the present application, also distinguishes the present application from the reference cited in the accompanying IDS, namely Japanese Patent Laid Open No. 4-68893 (Hoshi et al.).

In Hoshi et al., an operator selects a desired photographing position to be photographed by the camera 2 by clicking a position on the picture (map), as shown in Fig. 3, displayed on the monitor display 16 using the mouse 11, then the controller 10 shows the clicked position by, e.g., an arrow as shown in Fig. 3. Further, the controller 10 calculates control values for the universal head 3 such that the camera 1 faces to the selected photographing position, and transfers the calculated control values to the remote controller 5 via network controller 13, the line 19, IDSN public communication network 17, the line 18, and the network controller 8.

Thus, Hoshi et. al. merely teaches a way of designating the direction of the camera on a map, and does not disclose or suggest any idea of designating on a map a desired range of area, e.g., an angle of view, to be sensed by a camera.

Applicants respectfully submit that the claimed invention as recited in the amended independent claims is thus neither taught nor suggested by Hoshi et al., taken alone or in combination with any other art of record.

Dependent Claims:

While the dependent claims have been amended as necessitated by the amendments to the independent claims discussed above and also to correct minor informalities, Applicants have not independently addressed the rejections of the dependent claims because Applicants submit that, as the independent claims from which the dependent claims depend are allowable for at least the reasons discussed *supra*, the dependent claims are allowable for at least similar reasons. Applicants, however, reserve the right to address such rejections should such response be necessary and appropriate.

In view of the foregoing, Applicant respectfully submits that claims 1-19 as amended herein are allowable over the prior art of record, taken alone or in combination, and that the respective rejections be withdrawn. Applicants further submit that the application is hereby placed in condition for allowance which action is earnestly solicited.

CONCLUSION

In view of the foregoing, Applicants respectfully request reconsideration and allowance of this application.

Applicants believe no fees are required for this Amendment and that no extension of time is required for this filing. However, should an extension of time be necessary to render this filing timely, such is hereby petitioned, and the Commissioner is hereby authorized to charge any additional fees which may be required for this paper, or credit any overpayment, to Deposit Account No. 13-4500, Order No. 1232-4564.

In the event that a telephone conference would facilitate prosecution, the Examiner is invited to contact the undersigned at the number provided.

Respectfully submitted,
MORGAN & FINNEGAN, L.L.P.



Stephen J. Manetta
Registration No. 40,426

Dated: July 24, 2003 By:

Correspondence Address:
Morgan & Finnegan, L.L.P.
345 Park Avenue
New York, NY 10154
(212) 758-4800 (Telephone)
(212) 751-6849 (Facsimile)